

VPP Corporate Pilot Corporate-Facility Onsite Process

INTRODUCTION

OSHA requires applicants wishing to participate in the Voluntary Protection Programs (VPP) to submit an application describing the facility safety and health management system and undergo a facility onsite evaluation. This onsite evaluation is conducted by OSHA to confirm that VPP requirements are in place and the effective worker safety and health protections are maintained at the facility. All corporate facilities of participants in the VPP Corporate Pilot must also undergo an onsite evaluation. However, under the VPP Corporate Pilot a new streamlined process for onsite evaluations, known as the Corporate-Facility Onsite Process (C-FOP) is being tested for eligible corporate facilities to participate in VPP.

CORPORATE-FACILITY ONSITE PROCESS

Background

An approval into the VPP Corporate Pilot is given to a Corporation, only after successful completion of a rigorous onsite Corporate Program Evaluation at the corporate headquarters by OSHA of the standardized corporate safety and health policies, procedures, and programs, which are implemented across the participant's organization. These standardized policies/procedures must meet VPP criteria and ensure the adequate protection of workers organization-wide. Additionally, the Corporation must have effective internal prescreening processes in place to ensure corporate facilities applying for VPP status are "VPP-ready," preferably at the Star-level. Once OSHA confirms that corporate processes are satisfactory and approves the Corporation's participation in the VPP Corporate Pilot, eligible corporate facilities submit a streamlined application and undergo a VPP onsite evaluation using the Corporate-Facility Onsite Process (C-FOP) described below.

C-FOP Protocol

A typical C-FOP schedule will take 1 ½ - 2 days depending on the size of the facility and the complexity of operations and safety and health management systems. The protocol will be as follows:

Typical Day 1	
8:00 A.M.	Opening Conference <ul style="list-style-type: none"> ➤ OSHA Introductions and Roles ➤ Preliminary Document Review ➤ Facility Presentations <ul style="list-style-type: none"> - Overview of the processes conducted, products made, and facility layout. - Prescreening: The facility must review the prescreening conducted by their corporate headquarters, including a summary of the findings and corrections made. - Overview of the Safety and health management system including best practices

Typical Day 1	
	<ul style="list-style-type: none"> - Policies and/or Procedures that differ from corporate policies ➤ New information or changes since submitting VPP report or application
9:00 AM- 12:00	Walk around tour including informal interviews. The team may split up to view different areas.
12:00 P.M.	Working Lunch – Meet with Safety Committee/Employee Group Interviews
1:00 - 4:00 P.M.	Document Reviews Formal Interviews Additional review of work areas (as necessary)
4:00 P.M.	Team Meeting
4:30 P.M	Day 1 Closing Conference and Planning for next day <ul style="list-style-type: none"> ➤ Any hazards observed and corrective actions ➤ Discuss consistency of findings with application/pre-screening evaluation reports
Typical Day 2	
8:00 A.M.	Team Meeting
8:30 A.M.-9:30	Continue document review and assessment of VPP elements
9:30-11:00	Team consensus meeting and report writing
11:00 -noon	Closing Conference <ul style="list-style-type: none"> ➤ Provide Draft Report ➤ Discuss Team Recommendation ➤ Progress toward correcting any hazards observed; 90-day items

C-FOP Evaluation of VPP Elements

The OSHA Corporate Team during the Onsite Corporate Program Evaluation evaluates all standardized corporate safety and health program documents and ensures the VPP Corporate Pilot participant has effective prescreening processes in place to prepare their corporate facilities for VPP participation. Therefore, under C-FOP, the OSHA Team will conduct a streamlined evaluation of the VPP elements.

All four VPP elements of the facility safety and health management system will not be evaluated in the same detail as traditional VPP. With the thorough evaluation of the standardized corporate documents and prescreening processes during the Onsite Corporate Program Evaluation, the abbreviated review will be in the form of shortened, more efficient evaluation; conserving resources in the areas of document review, report writing, and interviews. Standardized corporate documents will not be re-evaluated under C-FOP. The OSHA Team needs to evaluate documents that demonstrate facility implementation of standardized corporate safety and health policies, programs, and systems. Also, any facility-specific programs or policies that differ from standard corporate requirements will be evaluated. These facility-specific programs should be highlighted in the facility application and during the facility presentation.

The OSHA Team should notify the applicant that if necessary, OSHA reserves the right to expand the scope of the onsite evaluation if findings during the evaluation indicate that

additional areas need to be reviewed. Additionally, OSHA reserves the right to reschedule the visit if during the evaluation evidence is found that the facility is underperforming or if there are any major issues or areas of concern.

C-FOP Document Review

Under the C-FOP, the OSHA Team streamlines the onsite evaluation by reducing document reviews. All standardized corporate policies/programs are reviewed during the Onsite Corporate Program Evaluation; therefore, the facility evaluation does not need to duplicate this effort. However, the OSHA Team should carefully review the Corporate Program Evaluation Report completed by the OSHA Corporate Team who conducted the Onsite Corporate Program Evaluation. The report will identify findings and cite all corporate policies reviewed during the Onsite Corporate Program Evaluation.

Facility-specific programs that differ from corporate policies will be reviewed during the onsite evaluation. Additionally, documents to be reviewed under C-FOP will focus on facility implementation of the corporate policies. Some examples are listed below:

- OSHA 300 logs, safety and health roles/responsibilities, documented facility injury/illness goals, accident investigation forms, Job Hazard Analyses, self-inspection records/forms, training logs, safety committee meeting minutes, written hazard control programs (e.g., hazard communication plan, blood borne pathogens exposure control plan), Industrial Hygiene monitoring records, Occupational Health Program Records (e.g., audiometric testing, pulmonary functions test results), annual self-evaluations

C-FOP Walkthrough

The OSHA Team will conduct a walkthrough of the entire facility to understand the type of work performed and to gain a sense of overall work condition, unless the size of the site or nature of the process does not allow for it, in which case a representative sampling of all major operating areas and supporting activities must be covered.

C-FOP Interviews

Since extensive interviews are conducted as part of the Onsite Corporate Program Evaluation with Corporate Executives and randomly selected employees at corporate facilities, the OSHA Team will conduct limited formal interviews with key representatives such as Plant Manager, Union Representative/Committee Member, First Line Supervisor, Other Production and Support Employees, Recordkeeper, Contractor, Contract Employee.

Typically, the facility safety and health staff interacts with the OSHA and is active in the preparation of the VPP application and onsite evaluation process. Therefore, formal interviews with the facility safety and health staff will be conducted on a limited basis. The interviews should focus on verifying internal prescreening and preparation processes conducted by Corporate Office to prepare the facility for VPP. Private formal interviews are conducted in a private area away from the workstation to ascertain the extent of safety and health involvement and program awareness of managers, supervisors, employees, and contractors. In addition to

the formal interviews, the C-FOP requires informal, group interviews with employees and individual employee interviews during the facility walkthrough.

C-FOP Team

The Onsite Evaluation Team will, at a minimum, typically be comprised of three team members. The Team composition is based on the size of the site and nature of the process, and must include at least Team Leader, Safety Engineer or Safety Specialist, Industrial Hygienist and additional Safety or Health Specialists, including others with knowledge and skills appropriate to the site. As available, Special Government Employee(s) will also be included on the Team for the evaluation. There may be some exceptions for team composition for small worksites with low risk operations.

C-FOP Report

The OSHA Team must write a report documenting the onsite evaluation to substantiate the OSHA Team's recommendation to the Regional Administrator and Assistant Secretary for approval facility in VPP. The C-FOP report format will differ from a traditional VPP report. The findings for all VPP elements must be summarized in the Executive Summary of the report following, Appendix A of the VPP Policies and Procedures Manual. Under C-FOP, the worksheets for the minimum requirements for each element must be completed by the Team. Under the Purpose and Scope Section of the Executive Summary, the report must identify that the facility was evaluated under C-FOP. Additionally, if the abbreviated evaluation of a VPP element needs expanded review or additional time is added to the onsite evaluation, it must be fully noted in the report.